

ROBERT M. RICH
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Attorney for Creditor, Xspand for FUNDCO

In Re:	:	UNITED STATES BANKRUPTCY COURT
	:	DISTRICT OF NEW JERSEY
PEARLENE BURCH,	:	CHAPTER 13
	:	CASE NO: 08-21002-JHW
	:	
Debtor.	:	NOTICE OF MOTION

TO: Isabel C. Balboa
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38-Suite 580
Cherry Hill, NJ 08002

DAVID PAUL DANIELS, P.A.
3300 Federal Street
Camden NJ 08105

MADAM AND SIR:

PLEASE TAKE NOTICE that the undersigned, attorney for
TIAGI, Inc., assignee of Xspande for FUNDCO, shall apply
before the Hon. Judith H. Wizmur, Judge of the United States
Bankruptcy Court, on July , 2013 at the United States
Bankruptcy Court, Camden, New Jersey, for an Order directing
the Clerk of the Court to pay to TIAGI, Inc. for Xspande for

FUNDCO the amount of \$16,031.31, which funds have been deposited by the Standing Trustee as undistributed funds.

The undersigned will rely upon the Certification of Stephen H. Rosen with regard to this application.

/S/Robert M. Rich
ROBERT M. RICH
Attorney for TIAGI, Inc.
Xspand for FUNDCO